

October 30, 2017

U.S. MAIL, RETURN RECEIPT REQUESTED

7017 1070 0000 4417 0993

U.S. EPA Region III
Director, Air Protection Division
Mail Code 3WC22
1650 Arch Street
Philadelphia, PA 19103-2029

U.S. MAIL, RETURN RECEIPT REQUESTED

7017 1070 0000 4417 0986

Division of Air Quality
WVDEP
601 57th Street
Charleston, WV 25304-2345

Re: Dominion Energy Transmission, Inc. – LL Tonkin Compressor Station
NSPS OOOOa - Initial Annual Report

Dear Sirs and/or Madam:

Dominion Energy Transmission, Inc. (DETI) owns and operates the LL Tonkin Compressor Station, located in West Union, Doddridge County, West Virginia and is subject to 40 CFR, Subpart OOOOa, Standards of Performance for Crude Oil, and Natural Gas Facilities. The LL Tonkin Compressor Station commenced operations of the two (2) new natural gas fired compression turbines on October 7, 2016 and the retrofit of the existing natural gas fired compression turbines on November 1, 2016.

In accordance with 40 CFR 60.5420a(b), DETI is submitting the initial annual report for LL Tonkin Compressor Station covering the time period of October 7, 2016 thru August 1, 2017. The affected facility at the LL Tonkin Compressor Station subject to 40 CFR 60, Subpart OOOOa is the collection of fugitive emission components at the compressor station.

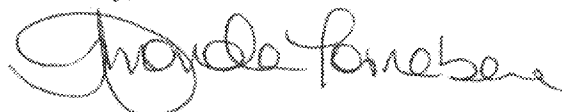
This initial annual report is being submitted according to the requirements specified in §60.5420a (b) and includes the following:

1. Attachment A: Certification by Certifying Official
2. Attachment B: General Site Information

3. Attachment C: Annual Fugitive Emissions Monitoring Report

If you have any questions regarding this submittal, please contact T.R. Andrade at (804) 273-2882, or via email at Thomas.R.Andrade@dominionenergy.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Amanda B. Tornabene". The signature is fluid and cursive, with the first name being the most prominent.

Amanda B. Tornabene
Director, Environmental Services (Air Program and Gas Infrastructure Group)

Enclosures

Attachment A
Certification by Certifying Official

WEST VIRGINIA CERTIFICATE OF DATA ACCURACY

Initial Annual Report - OOOOa

October 30, 2017

LL Tonkin Station

Company Name: Dominion Energy Transmission, Inc.

Facility Name: LL Tonkin Station

Facility Address: (b) (9)

Permit Number: R13-1077

R30-017000003-2010

Federal Tax ID – Plant Code: 55-0629203

Certification: I, Brian Sheppard, certify that I am a company officer or plant manager or authorized representative of the facility identified above, authorized to make this affidavit. I further certify that, based on information and belief formed after reasonable inquiry, the statements and information contained in this document are true, accurate, and complete.

Signature: 

Brian Sheppard
Vice President, Eastern Pipeline Operations

Date: 10-30-17

(Use Blue Ink)

Attachment B

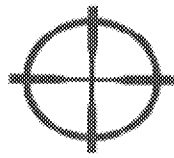
General Site Information

Dominion Energy Transmission, Inc.
LL Tonkin Compressor Station
Initial Annual Report
General Site Information

SITE INFORMATION	Company Name (§60.5420a(b)(1)(i))	Dominion Energy Transmission, Inc.
	Facility Site Name (§60.5420a(b)(1)(i))	LL Tonkin Compressor Station
	Address of Affected Facility (§60.5420a(b)(1)(i))	(b) (9)
	City	
	County	
	State Abbreviation	
	Zip Code	
Identification of Affected Facility(s)	Identification of each affected facility being included in the annual report. (§60.5420a(b)(1)(ii))	1. Collection of fugitive emission components at the compressor station
REPORTING INFORMATION	Beginning Date of Reporting Period. (§60.5420a(b)(1)(iii))	10/7/2016
	Ending Date of Reporting Period. (§60.5420a(b)(1)(iii))	8/1/2017
Certification Official	Name and title of certifying official (§60.5420a(b)(1)(iv))	Brian Sheppard / VP Eastern Pipeline Operations (Certification in Attachment A)

Attachment C

**Annual Fugitive Emissions Monitoring
Report**



TARGET
EMISSION SERVICES

Annual Fugitive Emission Monitoring Report

Dominion Energy Transmission, Inc.

LL Tonkin Compressor Station

(b) (9)

Initial Annual Report
NSPS Subpart OOOOa
PERIOD: 10/7/2016 - 8/1/2017

Prepared By:

Target Emission Services

800 Town and Country Blvd. (Suite 300)
Houston, Texas, 77024

WWW.TARGETEMISSION.COM

Report Generated on: Oct 18, 2017

SUMMARY



Company:	Dominion Energy Transmission, Inc.	Report:	Initial Annual Fugitive Emission Monitoring Report	
District:	Southern	Regulation(s):	NSPS Subpart 0000a	
Facility Name:	LL Tonkin Compressor Station	Report Date:	Oct 18, 2017	
GPS Coord.:	(b) (9)	Period:	2016-Oct-07	2017-Aug-01
This report satisfies the requirements of 40 CFR §60.5420a(b)(7) for the collection of fugitive emissions components at the above referenced compressor station.				
Information required to be reported per §60.5420a(b)(7)(i) - (vi)				
Monitoring Quarter	Q1	Q2	Q3	Q4
Survey Start Date/Time	N/A	05/08/2017 1:00 PM	N/A	N/A
Survey End Date/Time	N/A	05/08/2017 5:00 PM	N/A	N/A
OGI Technician <small>(See Appendix for OGI Technician Training and Experience)</small>	N/A	(b) (6)	N/A	N/A
Ambient Temp. (°F)	N/A	50	N/A	N/A
Sky Conditions	N/A	Mostly Sunny, 1%-10% sky is cloudy	N/A	N/A
Max. Wind Speed (MPH)	N/A	6	N/A	N/A
LDAR Instrument	N/A	Optical Gas Imaging/GFA-320	N/A	N/A
§60.5420a(b)(7)(vi) Deviations from Monitoring Plan	N/A	No deviations from the Monitoring Plan	N/A	N/A
Deviation(s) Explanation	N/A	N/A	N/A	N/A
§60.5420a(b)(7)(vii) - Number and type of components for which fugitive emissions were detected				
Valves		5		
Connectors		13		
Pressure Relief Devices		1		
Open-Ended Lines		0		
Flanges		0		
Compressors		0		
Instruments		0		
Meters		0		
Other		0		
Total No. of Leaks Detected		19		
§60.5420a(b)(7)(viii) - Number and type of fugitive emissions components that were not repaired as required in §60.5397a(h)				
Valves		N/A		
Connectors		N/A		
Pressure Relief Devices		N/A		
Open-Ended Lines		N/A		
Flanges		N/A		
Compressors		N/A		
Instruments		N/A		
Meters		N/A		
Other		N/A		
§60.5420a(b)(7)(ix) - Number and type of difficult-to-monitor and unsafe-to-monitor fugitive emission components monitored				
Valves		N/A		
Connectors		N/A		
Pressure Relief Devices		N/A		
Open-Ended Lines		N/A		
Flanges		N/A		
Compressors		N/A		
Instruments		N/A		
Meters		N/A		
Other		N/A		
§60.5420a(b)(7)(x) - Date of successful repair of the fugitive emission component (see Repair List)				
§60.5420a(b)(7)(xi) - Number and type of fugitive emission components placed on delay of repair and explanation for each delay of repair (see DOR List)				
§60.5420a(b)(7)(xii) - Type of instrument used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding (see Repair List)				

Fugitive Emissions Components Placed on DOR

This summary satisfies the annual reporting requirements of §60.5420a(b)(7)(xi), "number and type of fugitive emission components placed on delay of repair and explanation for each delay of repair".

Component				
Quarter	Q1	Q2	Q3	Q4
Valves		2		
Connectors		1		
Pressure Relief Devices				
Open-Ended Lines				
Flanges				
Compressors				
Instruments				
Meters				
Other				
Total No. of Leaks on DOR	3			
Date Surveyed	Emission ID #	Component Type	Current Repair Status	Delay of Repair Explanation / Justification
2017-May-08	73045277	Connector	Repaired	Shutdown required
2017-May-08	73045291	Valve	Repaired	Shutdown required
2017-May-08	73048260	Valve	Repaired	Shutdown required

Fugitive Emissions Components Repaired During Reporting Period

This summary satisfies the annual reporting requirements of §60.5420a(b)(7)(x), "date of successful repair of the fugitive emission component" and §60.5420a(b)(7)(xii), "type of instrument used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding".

Date Surveyed	Emission ID #	Date of Successful Repair	Repair Confirmation Method / Instrument
2017-May-08	73045282	2017-May-08	Optical Gas Imaging
2017-May-08	73045287	2017-May-08	Optical Gas Imaging
2017-May-08	73045289	2017-May-09	Bubble Test
2017-May-08	73045290	2017-May-09	Bubble Test
2017-May-08	73045288	2017-May-10	Bubble Test
2017-May-08	73045283	2017-May-19	Bubble Test
2017-May-08	73045284	2017-May-19	Bubble Test
2017-May-08	73045285	2017-May-19	Bubble Test
2017-May-08	73045286	2017-May-19	Bubble Test
2017-May-08	73045275	2017-May-26	Bubble Test
2017-May-08	73045276	2017-May-26	Bubble Test
2017-May-08	73045278	2017-May-26	Bubble Test
2017-May-08	73045279	2017-May-31	Bubble Test
2017-May-08	73045280	2017-May-31	Bubble Test
2017-May-08	73045281	2017-May-31	Bubble Test
2017-May-08	73048259	2017-May-31	Bubble Test
2017-May-08	73045291	2017-Jul-27	Bubble Test
2017-May-08	73048260	2017-Jul-30	Bubble Test
2017-May-08	73045277	2017-Jul-31	Bubble Test

OGI Technician Training and Experience

Monitoring surveys are performed by personnel that are trained in the proper operation of the OGIC (Optical Gas Imaging Camera) to be used in the monitoring survey and that have prior experience using OGICs for the purposes of identifying fugitive emissions. Additionally, monitoring personnel are familiar with the types of equipment located at a natural gas compressor station. All monitoring personnel review each site specific monitoring plan prior to performing monitoring surveys at the Facility.

All Monitoring Technicians follow a protocol containing technical procedures, training requirements, and individual and team performance audits. This protocol ensures that each crew member follows a prescriptive training program. The training program includes minimum required field times for each module. Each module uses both written testing and on-site work performance audits to evaluate the crew member on their work performance.

Each crew member must successfully complete their training modules to be allowed to work as a member of the main field crew. The protocol also includes an audit program to evaluate work performance on an on-going basis. This system ensures that each crew member is adhering to the procedures and guidelines of the protocol.

Each monitoring technician:

- 1) holds a strong knowledge of oil and gas operations and has a detailed understanding of the various processes that are involved in the transportation and processing of natural gas.
- 2) is trained (certified) and experienced in the use of fugitive emission detection and measurement equipment;
- 3) has a minimum of 1000 hours of experience on the use of optical gas imaging, ultrasonic leak detection and emission flow rate measurement
- 4) maintains required safety training and strong understanding of applicable TARGET Safe Operating Procedures; and
- 5) received performance audits to ensure compliance to our prescriptive fugitive emission assessment protocol

The protocol contains technical procedures, training requirements, and individual and team performance audits. The purpose of our assessment protocol is to:

- 1) Maintain a high degree of Quality Control;
- 2) Ensure that all sources of fugitive emissions are identified;
- 3) Ensure that all source data is consistently recorded to provide reliable and effective emission reduction recommendations.

This protocol eliminates the common problems and barriers that cause many programs to fail. Our staff are trained and audited to avoid many of the common fugitive emission program problems. Some of these common problems include:

- Inexperienced with camera use and the concepts of infrared thermography
- Not using multiple camera angles
- Constantly moving the camera from scene to scene without pausing in each view to look for gas images
- Many leaks are missed by relying solely on the automatic mode (manual mode can be more effective in certain situations)
- Scanning too fast and missing components

Accurate data collection and entry is crucial to maintaining an effective Fugitive Emission Management Program. The data management protocol includes a data QA/QC review process that contains three levels of evaluation:

- 1) Technician Self Check – at the end of each assessment the technician must review each emission entry to locate and remediate any data inconsistencies
- 2) Team Lead Review – at the end of each work day the Team Lead will run a QA/QC evaluation on each assessment and emission to ensure that data has been entered following the TARGET Protocol.
- 3) Project Manager Evaluation – on a weekly basis the project manager will run all emission data through a QA/QC data evaluation to detect and eliminate any inconsistencies.

OGI Technician Training and Experience

Survey Date	OGI Technician	Certification Date	Months of OGI Experience
2017-May-08	(b) (6)	2015-Sep-01	21